

DECLARATION OF C.R. ADDY, ESQ.

EXHIBIT J

BD2714C

G.A. NO. OF 2006

T. NO. 414 OF 2006

A.S. NO. OF 2006

IN THE HIGH COURT AT CALCUTTA

ADMIRALTY JURISDICTION

1. R.P. LOGISTICS PVT. LTD., a company incorporated under the Companies Act, 1955 and carrying on business at 12, Government Place East, Calcutta-700 069.

2. R. BIYARELAL INTERNATIONAL PVT. LTD., a company incorporated under the Companies Act, 1956 and carrying on business at 12, Government Place East, Calcutta-700 069.

PLAINTIFFS

-VERSUS-

1. THE OWNERS AND PARTIES INTERESTED IN THE VESSEL M.V. UTHAI NAVEE.

EC2714C

G.A. NO. OF 2006

T. NO. 414 OF 2006

A.S. NO. OF 2006

IN THE HIGH COURT AT CALCUTTA

ADMIRALTY JURISDICTION

1. ELP. LOGISTICS PVT. LTD., a company incorporated under the Companies Act, 1956 and carrying on business at 12, Government Place East, Calcutta-700 069.

2. R. BHARELAL INTERNATIONAL PVT. LTD., a company incorporated under the Companies Act, 1956 and carrying on business at 12, Government Place East, Calcutta-700069.

PLAINTIFFS

-VERSUS-

1. THE OWNERS AND PARTIES INTERESTED IN THE VESSEL M.V. UTHAI NAVTE.

2. THE OWNERS AND PARTIES
INTERESTED IN THE BUNKERS ON
BOARD THE VESSEL M.V. UTHAI
MALEE

3. OGI OCEANWAVE TRANSPORTA-
TION CO. LTD. a company
incorporated under the appropriate
laws of China, Republic of China and
carrying on business inter alia, at
906(A) Eagle Run Plaza, 35, Xinyuan
Road, Cheng District Beijing, China.

DEFENDANTS

To

1. M/s. Sandersons & Murgans,
Advocates for the plaintiffs,
5, Netaji Subhas Road,
Kolkata-700 001
2. M/s. Bose & Mitra,
Advocates for the defendant Nos. 2 & 3,
5, Old Post Office Street,
Kolkata-700 001

Dear Sirs,

PLEASE TAKE NOTICE that on the day of October,
2006 at the 10-00 O'clock in the forenoon or so soon thereafter as

counsel can be heard an application will be made on behalf of Unithai Line Public Co. Ltd., the petitioner abovesaid before the Hon'ble Judge taking Admiralty matters for an order that :-

- (a) Admiralty Suit being A.S. No. _____ of 2006 (R.P. Logistics Pvt. Ltd. & Anr. Vs- The Owners and Parties interested in the Vessel M.V. Uthai Navee & Ors.) be dismissed as against the vessel, M.V. Uthai Navee and the defendant No.1;
 - (b) The application for arrest being T. No.414 of 2006 be dismissed as against the vessel, M.V. Uthai Navee and the defendant No.1;
 - (c) The vessel, M.V. Uthai Navee be released from the order of arrest;
 - (d) The order dated 26th September, 2006 be vacated;
 - (e) Direction upon the plaintiffs to deposit a sum of USD 71,304 with the Registrar, Original Side of this Hon'ble Court;
 - (f) Direction upon the plaintiffs to make payment of USD 4000
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(h) Costs of and incidental of this application be paid by the plaintiffs;

(i) Such further order or order or direction or directions be given as to this Hon'ble Court may seem fit and proper;

Dated this _____ day of October, 2006.

Yours faithfully,

ADVOCATES FOR THE PETITIONER

GROUND S : Petition of the petitioner verified by an affidavit of Dilip Kumar Chatterjee affirmed this _____ day of October, 2006 and the cause papers in the suit.